

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10528-RCL/JD

DENISE M. BARRY and JANE B.
GREEN, ELIZABETH H. GOLDEN;
PATRICIA J. McDONOUGH;
ELAINE MESITI; LILA BROWN;
MARY M. KANE; and JUDITH A.
KELLEY

Plaintiffs,

v.

ROBERT J. MORAN, PAUL A.
CHRISTIAN, RODERICK FRASER,
JR., WILLIAM KESSLER,
WILLIAM HITCHOCK, CITY OF
BOSTON FIRE DEPARTMENT, and
JOHN and/or JANE DOES 1-50.

Defendants.

JOINT STATUS CONFERENCE STATEMENT OF THE PARTIES.

NOW COME the Parties to the above-entitled action and pursuant to this Honorable Court's *Notice of Status Conference dated 9 May 2008*, make the following Joint Statement:

I. Joint Proposed Discovery Schedule:

The Parties will serve their written discovery requests by 1 November 2008.

1. Factual discovery will be completed by 15 December 2008.
2. Expert disclosures, if any, will be made by 15 October 2008 , and expert discovery, if any, will be completed by 15 December 2008.

II. Joint Proposed Motion Schedule:

1. Rule 56 motions and Discovery motions, if any, will be filed by 15 February 2009.
2. Motions to Amend the Pleadings shall be filed by 20 June 2008.

III. Scheduling Items upon which the Parties Differ:

The Defendants join the Plaintiff in proposing the schedule above, but note that the *Amended Complaint* names John Doe defendants and that Plaintiffs' counsel has also indicated that he may seek to amend the Complaint to add Plaintiffs and/or Defendants and/or additional claims of acts of political patronage. In the event that additional parties are added, the Defendants would request additional time to complete discovery (to what extent is difficult to determine at this time due to the uncertainty of the scope of Plaintiffs' proposed additional claims).

IV Trial By Magistrate Judge:

The Parties are unable to reach an agreement as to the trial being heard before the Magistrate Judge at this time

V. Certification of Counsel

Counsel for the Parties herein certify that each has conferred with their respective clients with a view to establishing a budget for the costs of remaining litigation and have considered the use of alternative dispute resolution, but do not agree to engage in ADR at this time.

Respectfully submitted,

PLAINTIFFS

DENISE M. BARRY and JANE B.
GREEN, ELIZABETH H. GOLDEN;
PATRICIA J. McDONOUGH; ELAINE
MESITI; LILA BROWN; MARY M.
KANE; and JUDITH A. KELLEY

By their attorneys:

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DEFENDANTS

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CHRISTIAN, RODERICK FRASER, JR.,
WILLIAM KESSLER, WILLIAM
HITCHCOCK, CITY OF BOSTON FIRE
DEPARTMENT, et al.,

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